

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

08 FEB 21 2008
08 MJ 05 090CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

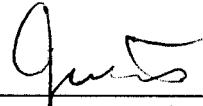
DEPUTY

UNITED STATES OF AMERICA,) Magistrate Case No. 08 MJ 05 090
 Plaintiff,)
 v.)
 Jesus Alberto SANCHEZ-Navarrete,) COMPLAINT FOR VIOLATION OF:
) Title 8 U.S.C., Sec. 1324 (a)(1)(A)(ii)
) Transportation of Illegal
) Aliens
)
 Defendant(s))
)

The undersigned complainant, being duly sworn, states:

On or about **February 20, 2008**, within the Southern District of California, defendant **Jesus Alberto SANCHEZ-Navarrete** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Gerson FLORES-Rodriguez, Cornelio RUIZ-Ruiz, and Germana MORALES-Cortez** had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


 SIGNATURE OF COMPLAINANT
 James Trombley
 Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 21st DAY OF FEBRUARY 2008.


 William McCurine Jr.
 UNITED STATES MAGISTRATE JUDGE

CONTINUATION OF COMPLAINT:

Jesus Alberto SANCHEZ-Navarrete

PROBABLE CAUSE STATEMENT

Furthermore, the complainant states that **Gerson FLORES-Rodriguez, Cornelio RUIZ-Ruiz, and Germana MORALES-Cortez** are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On February 20, 2008, Supervisory Border Patrol Agent D. Cook was performing his assigned Supervisory duties in the Campo Station's area of responsibility in Campo, California. Agent Cook was working in an area near Tierra Del Sol Road and State Route 94. This area is located approximately five miles north of the international border with Mexico and twenty miles east of the Tecate, CA port of entry. This area is frequently used by alien smugglers attempting to further the entrance of undocumented aliens. At approximately 4:00 a.m., Border Patrol Agent J. Walthall responded to a seismic intrusion device near the intersection of Tierra Del Sol Road and Highway 94. Upon arriving, Agent Walthall noticed footprints leading up to the intersection of Tierra Del Sol Rd. and Highway 94. Agent Walthall then heard a vehicle near the aforementioned intersection and requested assistance to investigate. Agent Cook responded and noticed a Red Dodge Ram Pick-up truck parked at an angle partially blocking the northbound lane of Tierra Del Sol Road. Agent Cook came to a stop and noticed that the driver and passenger doors were wide open. Agent Cook then observed several individuals in the truck. Agent Cook walked towards the truck and observed an individual later identified as the defendant **Jesus Alberto SANCHEZ-Navarette** exit the driver side door and attempt to flee. Agent Cook then identified himself as United States Border Patrol Agent and instructed the defendant to stop and had him sit on the ground. Agent Cook then questioned the twelve individuals in the truck as to their citizenship. All twelve individuals admitted to being from Mexico, illegally present in the United States and did not possess any immigration documents that would allow them to be or remain in the United States legally. Agent Cook then questioned the defendant, as to his citizenship. The defendant admitted to being born in Mexico and that he did not possess any immigration documents allowing him to be in the United States legally. At 4:15 AM, the defendant and the twelve individuals, were placed under arrest and transported to the Campo Border Patrol Station for processing.



James Troubley
Senior Patrol Agent



William McCurine Jr.
U.S. Magistrate Judge

2/21/08, 12:17 hrs
Date/Time

CONTINUATION OF COMPLAINT:

Jesus Alberto SANCHEZ-Navarrete

DEFENDANT STATEMENT:

The defendant was advised of his Miranda rights and was willing to answer the agent's questions without the presence of a lawyer. SANCHEZ stated that he was put in contact with a smuggler via cell phone. He was given directions and a vehicle so he could pick up the illegal aliens in Campo, CA. He met with this person in National City near the Naval Base.

MATERIAL WITNESSES STATEMENTS:

Material witnesses **Gerson FLORES-Rodriguez**, **Cornelio RUIZ-Ruiz**, and **Germana MORALES-Cortez**, agree in summary that they are citizens and nationals of Mexico illegally present in the United States. They admit to entering the United States illegally. The material witnesses stated that they were to pay \$1,800.00 to \$2,000.00 (US) to be smuggled into the United States. Material witnesses **FLORES-Rodriguez**, **Cornelio RUIZ-Ruiz**, and **Germana MORALES-Cortez**, were shown a photographic line up and were able to identify the defendant **Jesus Alberto SANCHEZ-Navarrete** as the driver.